



Tre Hargett
Secretary of State

Division of Business Services
Department of State
State of Tennessee
312 Rosa L. Parks AVE, 6th FL
Nashville, TN 37243-1102

BOTTOMLEY ENTERPRISES, INC
AKA/POE: MITCHELL BOTTOMLEY
5071 GLADE VALLEY ROAD
ENNICE, NC 28623

10/05/2021

RE: JORDYN GRIFFIS

Received
10-11-21 *MPB*

VS: MARY E BRUNK & BOTTOMLEY ENTERPRISES, INC

Notice of Service

The enclosed process, notice or demand is hereby officially served upon you by the Tennessee Secretary of State pursuant to Tennessee law. Please refer to the process, notice or demand for details concerning the legal matter. If you have any questions, please contact the clerk of the court that issued the process, notice or demand.

The process, notice or demand may have a court date and time that you must appear to defend yourself or the number of days from the date of service by which you are required to file an answer. Failure to appear in court at the time specified or failure to file an answer in the given time could result in a default judgement being rendered against you for relief sought in the lawsuit.

The Secretary of State's office cannot give you legal advice. If you need legal advice, please consult a private attorney.

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Enclosures: Original Documents

DOCUMENT INFORMATION

SOS Summons #: 11455478
Case #: 21-CV-29
Certified #: 9489009000276336733472

Hickman County Circuit
Court

STATE OF TENNESSEE
CIVIL SUMMONS

Case Number

21-CV-29

page 1 of 2

Jordyn Griffis

Vs.

Mary E. Brunk & Bottomley Enterprises, Inc.

Served On:

Bottomley Enterprises, 5071 Glade Valley Road Ennice NC 28623
Inc.- Mitchell Bottomely

You are hereby summoned to defend a civil action filed against you in Circuit Court, Hickman County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: 9/21/21

(Clerk/ Deputy Clerk)

Attorney for Plaintiff: Caleb D. Thomas
28 E. Main St. Hohenwald, TN 38462

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____, Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____, Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____
Clerk / Deputy Clerk

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows: _____

Date: _____

By: _____
Please Print: Officer, Title

Agency Address

Signature

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____, I sent by _____, I sent by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____ I received the return receipt, which had been signed by _____ and certified by _____ of the original of this instrument within this cause. This instrument was served _____ days after _____.

Date: _____

Notary Public / Deputy Clerk (Comm. Expires _____)

Signature of Plaintiff

Plaintiff's Attorney (or Person Authorized to Serve Process)

ADA: If you need assistance or accommodations because of a disability, please call _____, ADA Coordinator, at () _____.

IN THE CIRCUIT COURT OF HICKMAN COUNTY
AT CENTERVILLE TENNESSEE

JORDYN GRIFFIS,
Plaintiff,

vs.

MARY E. BRUNK,
And
BOTTOMLEY ENTERPRISES, INC.,

Defendants.

Docket No.: 21-CV-29
JURY TRIAL DEMANDED

FILED

SEP 21 2021

By Dana Nicholson, Circuit Court Clerk
Dep. Clk.

COMPLAINT

Comes now the Plaintiff, Jordyn Griffis, by and through counsel and for is Complaint against Mary E. Brunk ("Brunk") and Bottomley Enterprises, Inc. ("Bottomley") and states as follows:

JURISDICTION AND VENUE

1. The incident giving rise to this action occurred in Hickman County, Tennessee. Venue in this court is proper pursuant to T.C.A. § 20-4-101.
2. This Court may properly exercise jurisdiction over the parties and subject matter of this Complaint.

PARTIES

3. Plaintiff, Jordyn Griffis, is a resident of Marshall County, Tennessee.
4. Defendant, Mary Brunk, is an employee of Bottomley Enterprises, Inc. who was operating a company vehicle in Tennessee on Interstate 40 in Hickman County
5. Defendant, Bottomley Enterprises, Inc., is an incorporation who's employee was operating a company vehicle in Tennessee on Interstate 40 in Hickman County

STATE OF TENNESSEE, HICKMAN COUNTY
I, the undersigned Circuit Court Clerk
do hereby certify that this is a true
and correct copy of the original of
this instrument filed in this cause.
This day of 2021

CIRCUIT COURT CLERK

FACTS

6. On September 23, 2020 the vehicle driven by Chelsea Coble was traveling East on Interstate 40 through Hickman County, Tennessee.
7. Jordyn Griffis was a passenger of the vehicle driven by Chelsea Coble.
8. Mary E. Brunk was operating a tractor trailer owned by Bottomley Enterprise, Inc. and traveling on Interstate 40 through Hickman County in the same direction as the vehicle operated by Chelsea Coble.
9. Brunk abruptly attempted to change from her lane of traffic into the lane of traffic occupied by Chelsea Coble causing the tractor trailer to strike the vehicle driven by Coble and occupied by Griffis.
10. More specifically Brunk made an unlawful lane change negligently causing the vehicle she was operating to strike the vehicle operated by Chelsea Coble.
11. Jordyn Griffis sustained injuries and damages as a direct and proximate result of Defendant, Mary Brunk's negligence while she was operating in her capacity as an employee of Bottomley Enterprises, Inc.

NEGLIGENCE & NEGLIGENCE PER SE

12. The action of Defendant Mary Brunk constitute negligence and negligence *per se*, and are in violation of the common law and statutory laws of the State of Tennessee.
13. Specifically, the actions of Defendant, Mary Brunk violated:
 - a. Tenn. Code Ann. §55-8-136- Drivers to exercise due care;
 - b. Tenn. Code Ann. § 55-8-143- Signal for Turns;
 - c. Tenn. Code Ann. §55-8-197- Failure to yield right-of-way
 - d. Tenn. Code Ann. § 55-8-123- Driving on roadways laned for traffic

14. The improper actions of Defendant, Mary Brunk, while operating under her employment by Bottomley Enterprises, Inc. were negligent and served as the sole proximate cause of this accident.

15. The Vehicle operated by Mary Brunk was owned by Bottomley Enterprises, Inc. for the purpose of transporting good to and from destinations to Tennessee and various other states as a business practice. Bottomley Enterprises, Inc. employed Mary Brunk for the purpose of operating this company vehicle in such a manner and therefore are vicariously liable for the damages incurred by the negligence of their driver.

DAMAGES

16. Chelsea Coble was covered by an automobile insurance policy by State Farm Insurance that was active on the date of this collision and covered a portion of medical bills related to this cause of action.

17. State Farm has paid benefits under this policy and should be notified as an indemnity to this cause of action for all payments made due to this collision.

18. Plaintiff, Jordyn Griffis, requires regular appointments with a chiropractor due to headaches and back pain resulting from this incident.

19. To date Plaintiff has three thousand one hundred thirty dollars (\$3,130.00) of medical bills related to this incident up to this point and will continue to incur medical bills in relation to this incident

20. As a direct proximate result of this incident, the Plaintiff sustained painful person injuries, suffering, undue emotional duress, loss of earning capacity, and loss of ability to participate in and enjoy the pleasures of life, for all which she deserves compensation.

WHEREFORE, PREMISES CONSIDERED, PLAINTIFF PRAYS:

1. For process to issue and be served upon all Defendants, requiring same to answer the allegations hereof;
2. For a judgement against the Defendant(s) for compensatory damages in an amount to be determined by the trier of fact, but in no event to exceed \$750,000.00 (seven hundred fifty thousand dollars) as a result of the personal injuries herein complained of as a proximate result of the Defendant's negligence.
3. That should this action require a trial that a jury trial be demanded.
4. For an award of all discretionary costs, court cost, and such other and further relief that shall be deemed reasonable and necessary.

Respectfully submitted this the 21st day of September, 2021



Caleb D. Thomas (036958)
28 E. Main St.
Hohenwald, TN 38462
(931) 487-4070

OATH

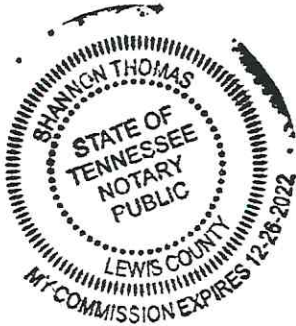
STATE OF TENN.)
Lewis COUNTY)

I, Jordyn Griffis, and would state under oath that the facts stated in the foregoing Complaint are true and correct to the best of her knowledge, information, and belief and that this Complaint is not made out of levity or collusion with the respondent.

Jordyn Griffis
Jordyn Griffis
PETITIONER

SWORN TO AND SUBSCRIBED BEFORE ME THIS 26 DAY OF September, 2021.

Shannon Thomas
NOTARY PUBLIC
My commission expires: 12/26/2022



CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been furnished to Defendants
via, Service of Process through the Secretary of State for Tennessee's office and via U.S. Mail.

Bottomley Enterprises, Inc.
6460 Glade Valley Rd.
Ennice, NC 28623

Mary E. Brunk
2163 Eagle Crest Rd.
Camp Creek, WV 25820

A handwritten signature in black ink, appearing to read 'Caleb D. Thomas', is written over a horizontal line.

Caleb D. Thomas (BPR 036958)